

# EXHIBIT 9

DOCKET NO.: LLI-CV-16-6013214-S : SUPERIOR COURT  
TOWN OF NEW MILFORD : JUDICIAL DISTRICT OF  
LITCHFIELD  
v. : AT TORRINGTON  
STANDARD DEMOLITION SERVICES, INC. : OCTOBER 3, 2018

**DEFENDANT'S SECOND REQUESTS FOR ADMISSION**

Pursuant to P.B. § 13-22 et seq., plaintiff, Town of New Milford, hereby requests that defendant, Standard Demolition Services, Inc., admit or deny the following requests for admission within thirty (30) days of the date of these requests.

**Instructions & Definitions**

Plaintiff hereby incorporates the definitions of terms pertaining to discovery requests set forth in P.B. § 13-1 and utilizes these terms herein consistent with said definitions. The term "Plaintiff" refers to the Town of New Milford. The terms "Defendant" or "SDS" refer to Standard Demolition Services, Inc. The terms "Century Brass" or "Site" refer to 12 Scovill Street, New Milford, CT, the site of the former Century Enterprise Center building at issue in this litigation. If any term is defined in these Instructions & Definitions or in any request herein, such term is used thereafter consistently with its stated definition.

**Requests for Admission**

1. On September 2, 2015, Plaintiff's Director of Public Works, Michael F. Zarba, sent an email to Stephen Goldblum of SDS containing thirteen (13) attachments with the subject line "Fwd: Approval for Phase III Work", attached hereto as Exhibit A. Said email was received by Stephen Goldblum.

**RESPONSE:**

2. The thirteen (13) documents attached to Mr. Zarba's September 2, 2018 email (i.e. Exhibit A) included the following documents: 1) Phase III Approval 09012015.pdf, (attached hereto as Exhibit B); 2) May 22 e-mail\_Town of New Milford Mail\_.pdf, (attached hereto as Exhibit C); 3) Responses to EPA Comments from 07 13 15 and 07 14 15 TRC.pdf, (attached hereto as Exhibit D); 4) April 2 e-mail\_Town of New Milford Mail\_.pdf, (attached hereto as Exhibit E); 5) April 17 e-mail\_Town of New Milford Mail\_.pdf, (attached hereto as Exhibit F); 6) EPA Comment Letter April 2 2015.pdf, (attached hereto as Exhibit G); 7) EPA Response Letter\_4-17-15.pdf, (attached hereto as Exhibit H); 8) July 13 & 14 e-mails\_Town of New Milford Mail\_.pdf, (attached hereto as Exhibit I); 9) July 31 e-mail\_Town of New Milford Mail\_.pdf, (attached hereto as Exhibit J); 10) June 12 e-mail\_Town of New Milford Mail\_.pdf, (attached hereto as Exhibit K); 11) Revised Page 2 of Table 5-3.pdf, (attached hereto as Exhibit L); 12) Revised Page 5-5.pdf, (attached hereto as Exhibit M); and 13) Phase 1 PCB Plan T\_B.pdf, (attached hereto as Exhibit N).

**RESPONSE:**

3. The copies attached hereto as Exhibits A through N are true, accurate, complete and genuine copies of the documents described in the two preceding requests.

**RESPONSE:**

4. The document attached to Mr. Zarba's September 2, 2018 email entitled "Phase III Approval 09012015.pdf" (hereinafter, "Phase III Approval Letter", attached as Exhibit B) states at Paragraph 11, Subsection b. of Attachment 1 as follows: "[t]he Town shall submit the following information for EPA review and/or approval: . . . b. a contractor work plan, prepared and submitted by the selected demolition or abatement contractor(s) describing the activities that will be employed during abatement activities. At a minimum, this work plan should include details on containment and air monitoring; details on PCB waste storage, handling, and disposal; and, details on decontamination of field equipment and any other PCB-contaminated materials;".

**RESPONSE:**

5. Paragraph 11(a) of Attachment 1 of the Phase III Approval Letter (i.e. Exhibit B) required the Town to submit to EPA "a certification signed by its selected abatement/demolition contractor, stating that the contractor(s) has read and understands the Notification, and agrees to abide by the conditions specified in this Approval;"

**RESPONSE:**

6. On September 3, 2015, SDS executed a certification pursuant to Paragraph 11(a) of Attachment 1 recited in the preceding request and provided it to the Town, attached hereto as Exhibit W.

**RESPONSE:**

7. The copy of the certification cited in Request for Admission #6, attached hereto as Exhibit W, is a true, accurate, complete, and genuine copy of said certification.

**RESPONSE:**

8. Pursuant to Paragraph 11(b) of Attachment 1 of the Phase III Approval Letter, Defendant, as Plaintiff's selected demolition or abatement contractor, was required to submit a contractor work plan describing the activities that will be employed during abatement activities, including details on containment and air monitoring; details on PCB waste storage, handling, and disposal; and, details on decontamination of field equipment and any other PCB-contaminated materials.

**RESPONSE:**

9. The document attached to Mr. Zarba's September 2, 2018 email entitled "July 13 & 14 e-mails\_Town of New Milford Mail...pdf", attached hereto as Exhibit I, contains a total of fourteen (14) numbered questions submitted to Plaintiff by Ms. Kim Tisa, EPA Region 1 PCB Coordinator on July 13<sup>th</sup> and 14<sup>th</sup> of 2015, with the July 13<sup>th</sup> set of questions numbered 1 through 5 and the July 14<sup>th</sup> set of questions numbered 1 through 9.

**RESPONSE:**

10. The document attached to Mr. Zarba's September 2, 2018 email entitled "Responses to EPA Comments from 07 13 15 and 07 14 15 TRC.pdf", (hereinafter, "Responses to EPA Comments"), attached hereto as Exhibit D, contains the fourteen (14)

questions from the July 13 & 14 Tisa Questions described in the preceding request, as well as TRC's responses to each respective question.

**RESPONSE:**

11. Comment #6 of Kim Tisa's July 14, 2015 email, contained within Exhibit I reads: "[t]he notification indicates that the overhead cranes had PCBs at > 10 µg/100 cm<sup>2</sup> and would be disposed in a non-TSCA facility and may be decontaminated. What are the PCB concentrations on the cranes? Are the PCBs in the paint rather than in dust?"

**RESPONSE:**

12. Comment #6 of Kim Tisa's July 14, 2015 email, cited in Request for Admission #11, indicates that she knew, understood, or had information indicating the overhead cranes remaining at Century Brass were painted.

**RESPONSE:**

13. "TRC RESPONSE 07.13.15 - #6", within Exhibit D attached hereto, contains TRC's response to Kim Tisa's Comment #6 set forth in Request for Admission #11 and includes the statement "[c]onsistent with the Phase I and Phase II approach for non-porous materials, the Modified Phase III SIP/notification had indicated that the overhead cranes would be decontaminated as needed, verified by wipe sampling, and disposed offsite at a non-TSCA facility. The means and methods for crane decontamination and disposition for disposal or recycling will be specified by the Contractor in their Work Plan(s) and would be subject to review and approval by the Town and EPA."

**RESPONSE:**

14. TRC's response to Kim Tisa's Comment #6 cited in Request for Admission #13 indicates that the painted overhead cranes, per "the Modified Phase III SIP/notification", would be considered "non-porous" for the purpose of "decontamination and disposition for disposal or recycling".

**RESPONSE:**



15. TRC's response to Comment #6, "TRC RESPONSE 07.13.15 - #6", within Exhibit D attached hereto, contains the statement, "[t]he PCB concentrations on the remaining overhead cranes, as presented in Tighe & Bonds's IRAR range from 'ND' to 4,500 (Samples C101-C109, C201-C209, C301-C305, and C401-C405). The units are presented as in terms of 'mg/kg' in Table 6-5 and 'ug/wipe' in Appendix E of the IRAR. Half of the twenty eight wipe sample results indicated 'ND' and the other half indicated concentrations of 1,000 or higher. Presumably the results are based hexane extraction with standard 100 cm2 wipes, but this was not documented."

**RESPONSE:**

16. TRC's response to Kim Tisa's Comment #6 cited in Request for Admission #15 represents that twenty-eight (28) wipe samples relating to overhead cranes remaining at Century Brass were presented in Tighe & Bond's IRAR.

**RESPONSE:**

17. Comment #9 of Kim Tisa's July 14, 2015 email, contained in Exhibit I attached hereto, reads: "[j]ust a note for your consideration, for the steel beams, etc, and for recycling, do we need to be concerned about contamination from dust, etc?"

**RESPONSE:**

18. Comment #9 cited in Request for Admission #17 indicates that Kim Tisa contemplated dust with PCBs contaminating the structural steel at Century Brass, was aware that dust with PCBs may contaminate the structural steel at Century Brass, or had information indicating that dust with PCBs may contaminate the structural steel at Century Brass.

**RESPONSE:**

19. TRC's response to Kim Tisa's Comment #9, "TRC RESPONSE 07.13.15 - #9", within Exhibit D attached hereto, contains the statement "[a]s discussed during the July 27, 2015 conference call, TRC agrees that contamination from dust should be considered. Tighe & Bond has previously categorized the steel beams as 'non-porous' and conducted wipe samples as also reported in Section 5.8 of the Phase I plan (attached). From an on-

site health and safety standpoint, dust will be monitored and controlled during the work by the Contractor and the Contractor will be responsible for compliance with all applicable waste disposal requirements. These plans will be specified in the Contractors Work Plan(s) which are subject to the Town and EPA approval.”

**RESPONSE:**

20. TRC’s response to Kim Tisa’s Comment #9 cited in Request for Admission #19, indicates that Tighe and Bond previously categorized the steel beams present at Century Brass as “non-porous” in prior remediation phases at the Site.

**RESPONSE:**

21. TRC’s response to Kim Tisa’s Comment #9 cited in Request for Admission #19 indicates that the Town’s contractor would be responsible “for compliance with all applicable waste disposal requirements.”

**RESPONSE:**

22. The document attached to Mr. Zarba's September 2, 2018 email entitled "July 31 e-mail\_Town of New Milford Mail\_.pdf", attached hereto as Exhibit J, indicates that Responses to EPA Comments from 07 13 15 and 07 14 15 TRC.pdf, attached hereto as Exhibit D, was sent to Kim Tisa and Mr. Gary Trombly on July 31, 2015.

**RESPONSE:**

23. The document attached to Mr. Zarba's September 2, 2018 email entitled "Phase 1 PCB Plan T\_B.pdf.", attached hereto as Exhibit N, contains the following excerpt in Section 3.5 on page 3-9, "[l]ead-based paint in significant amounts was identified on the wood garage doors, structural steel, exterior metal wood shop duct, clarifier, and raw materials storage tank within the WWTP."

**RESPONSE:**

24. The excerpt cited the preceding request indicates that the structural steel at Century Brass was painted with lead-based paint.

**RESPONSE:**

25. Section 5.8 on pages 5-5 and 5-6 of Exhibit N refers to beams and overhead cranes inside the Century Brass building as non-porous materials.

**RESPONSE:**

26. Attached hereto as Exhibit O is the first version or draft of a EPA PCB Contractor Work Plan sent by SDS to TRC or Plaintiff.

**RESPONSE:**

27. On November 6, 2015, Defendant sent Plaintiff a draft of its EPA PCB Contractor Work Plan (attached hereto as Exhibit P) to TRC or Plaintiff by way of a SharePoint Document Library as documented in Exhibit Q attached hereto.

**RESPONSE:**

28. Exhibit P was the second version or draft of Defendant's EPA PCB Contractor Work Plan submitted to TRC or Plaintiff.

**RESPONSE:**

29. On November 18, 2015, Defendant sent Plaintiff a draft of its PCB Contractor Work Plan (attached hereto as Exhibit R) to TRC or Plaintiff by way of a SharePoint Document Library as documented in Exhibit S attached hereto.

**RESPONSE:**

30. Exhibit R was the third version of Defendant's EPA PCB Contractor Work Plan submitted to TRC or Plaintiff.

**RESPONSE:**

31. Exhibit R was the fourth version of Defendant's EPA PCB Contractor Work Plan submitted to TRC or Plaintiff.

**RESPONSE:**

32. The November 18, 2015 draft of Defendant's PCB Contractor Work Plan was sent to the EPA as documented in Exhibit T attached hereto.

**RESPONSE:**

33. Defendant's PCB Contractor Work Plan identified in Request for Admission # 29 (Exhibit R) does not provide for, mention, plan for or require any volumetric testing of paint (i.e. paint chip testing) on structural steel or overhead crane steel at the Century Brass Site.

**RESPONSE:**

34. Defendant's PCB Contractor Work Plan identified in Request for Admission # 29 (Exhibit R) was the last version or draft of SDS's PCB Contractor Work Plan submitted to TRC or Plaintiff and said PCB Contractor Work Plan was sent to EPA.

**RESPONSE:**

35. Kim Tisa, identified as "Author: ktisa", provided comments on Defendant's November 18, 2015 PCB Contractor Work Plan (Exhibit R), with said comments attached hereto as Exhibit U. Said PCB Contractor Work Plan with Kim Tisa comments was sent to Plaintiff and/or TRC on November 23, 2015, as documented in Exhibit V attached hereto.

**RESPONSE:**

36. Kim Tisa's comments on Exhibit U are denoted by numbered boxes within or on the Plan's text, with each comment set forth on the following page with numbers corresponding with the boxes on the prior page.

**RESPONSE:**



37. None of the comments made by Kim Tisa on Exhibit U dispute, question, contest or challenge the use of wipe sampling as Defendant's proposed method to determine possible PCB contamination on structural steel at Century Brass.

**RESPONSE:**

38. None of the comments submitted by Kim Tisa on Exhibit U dispute, question, contest or challenge the use of wipe sampling as Defendant's proposed method to determine possible PCB contamination on the overhead cranes at Century Brass.

**RESPONSE:**

39. None of the comments made by Kim Tisa on Exhibit U required paint chip testing on the structural steel at Century Brass.

**RESPONSE:**

40. None of the comments made by Kim Tisa on Exhibit U required paint chip testing on the overhead crane steel at Century Brass.

**RESPONSE:**

41. Defendant did not assert the need for a change order or raise any issue relating to potential PCB contamination of paint on structural steel at Century Brass in writing to Plaintiff until November 30, 2015 in a letter, attached hereto as Exhibit X, from Mr. Todd Weldon to Mr. Michael F. Zarba.

**RESPONSE:**

42. Defendant did not assert the need for a change order or raise any issue relating to potential PCB contamination of dust on structural steel at Century Brass in writing to Plaintiff until November 30, 2015 in a letter, attached hereto as Exhibit X, from Mr. Todd Weldon to Mr. Michael F. Zarba.

**RESPONSE:**

DEFENDANT  
TOWN OF NEW MILFORD

By: 

John D. Tower  
Attorneys for Defendant  
Cramer & Anderson LLP  
51 Main Street  
New Milford, CT 06776  
Juris No. 12733

**CERTIFICATION**

I hereby certify that the undersigned caused the original of the foregoing Defendant's Requests for Admission to which this certification is attached, to be mailed, postage prepaid, to all counsel of record on October 3, 2018, as follows:

Raymond A. Garcia, Esq.  
Garcia & Milas, P.C.  
44 Trumbull Street  
New Haven, CT 06510

Dated: October 3, 2018  
New Milford, CT

  
John D. Tower

# EXHIBIT U

# ***Standard Demolition Services, Inc.***

DEMOLITION CONTRACTORS

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30 Nutmeg Drive  
Trumbull, CT 06611

## **PCB Contractor Work Plan**

**Century Enterprise Center**

**12 Scovill Road**

**New Milford, CT**

Prepared by:

Standard Demolition Services, Inc.

30 Nutmeg Drive

Trumbull, CT 06611

(203) 380-8300

November 2015

Plaintiff's  
Exhibit 48

6/27/2018  
S. Goldblum

RMR

# Standard Demolition Services, Inc.

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## **Site location and description**

The Site known as the Century Enterprise Center (CEC) is located at 12 Scovill Road, along Aspetuck Ridge Road in New Milford, Connecticut, near the intersection of Housatonic Avenue. Historically, the CEC has been referred to by other names, including the "Century Brass Facility", "Century Brass Tube Mill" or "Davko Site", depending on former usage. According to the Town of New Milford Tax Assessor's files, the Site is identified on Map 34/Blocks 40 and 41, and Map 35/Blocks 2, 4, and 5. Site access is obtained via a gate at the end of Scovill Road off Aspetuck Road.

The Site is currently abandoned and is owned by the Town of New Milford (Town). Although certain structures have been demolished and/or removed from the site during previous demolition and remediation projects, the main mill building, nominally 40 feet high and having an overall footprint of approximately 320,000 square feet, still remains. The building is not considered suitable for reuse, is currently considered unsafe for structural reasons principally related to the roof, and has been designated for demolition.

## **Purpose**

Demolition of the building, which will include certain abatement and remedial activities, is intended to move the Site closer to a beneficial reuse scenario using available funding sources. The Town is ultimately seeking to achieve unrestricted use status for the property. Based on site-specific documentation reviewed by Standard Demolition Services, Inc. (SDS), a limit of 1 mg/kg PCBs in soil and concrete, if any, to remain on site will be appropriately protective to allow unrestricted use (assuming other contaminants besides PCBs are also adequately addressed). SDS has been retained by the Town to provide abatement and demolition services directed toward future site re-development. Accordingly, SDS has prepared this Contractor Work Plan (Plan) in support of Phase III PCB Remediation at the Site, which will be performed as part of the overall building demolition project. The intention of the Plan is to meet the EPA's requirements for a Contractor Work Plan as well as to satisfy the requirements of the Project Specification Section 02 12 00, Contaminated Materials Remediation Work Plan. The details of the proposed Phase III work are further described in various sections of this Plan.

## **Scope**

The scope of the Phase III PCB Remediation is to address known PCB impacts within the building and the floor slab, as well as limited areas of PCB contaminated soil beneath the building floor slab, and at two exterior locations: along the exterior wall of the former electrical room; and at the

# Standard Demolition Services, Inc.

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overhead door nearest concrete sample B-39. The order of operations proposed to be implemented by Standard Demolition is:

- Install wheel wash station and equipment decontamination areas
- Wipe sample steel columns for PCB characterization
- Wipe sample and characterize overhead cranes for removal and disposal
- Remove designated sections of concrete slab and soil with PCB concentrations of  $\geq 50$  ppm
- Demolish and remove steel structure
- Perform pre-characterization of concrete slab in advance of milling and disposal
- [2] Remove Expansion Joint caulk (PCB Remediation Waste with Non-Friable ACM)
- Perform milling of the concrete slab and direct loading of the concrete millings for disposal
- Perform verification sampling of the remaining portions of the building slab



## Implementation

### *Environmental Controls*

Prior to removal of the structure, a wheel wash station will be installed at the location shown on Sketch A. The wash station will be constructed of a layer of 20 mil EPDM roof membrane. A sump will be installed in the lowest corner of the wash station for water collection. Steam cleaning pressure washing equipment will be used to reduce the amount of water generated during truck tire decontamination. Water generated will be disposed in accordance with CFR 761.79(g)(6) as PCB remediation waste water through EQ Northeast.



Dust control equipment will be mobilized to the Site. Water atomizing equipment called Buffalo Turbines will be set up and aimed at the work locations as they progress.

Dust monitoring equipment will be installed at two locations at the Site; one will be an upwind and the other a downwind monitor. The dust monitoring program is discussed later in this document.

### *PCB Impacted Soil*

PCB impacted soil identified below windows containing State Regulated PCB caulk and glazing has been profiled for approval at Turnkey Landfill in Rochester New Hampshire. Pending approval by Waste Management, the anticipated 30 tons of soil with PCB concentrations  $>1$  and  $< 50$  ppm will be excavated from the site and loaded directly into lined dump trailers for disposal.

Two other exterior areas of PCB contaminated soil are present on the site and will also require remediation to the unrestricted use goal of 1.0 ppm: a small area of PCB contaminated soil adjacent to the former electrical room; and a small area adjacent to an overhead door along the eastern exterior wall of the building. Both areas are shown on Figure 3 of the approved SIP. Upon completion of the excavations



# Summary of Comments on Work Plan Sketch A.pdf

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Page: 4

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Number 1	Author: ktrisa	Subject: Sticky Note	Date: 11/23/2015 12:00:35 PM
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Clarify what the expansion joint caulk is as this was not discussed in the Notification. Why is it a PCB remediation waste? Where will this waste be disposed of? If it is being disposed as a > 50 ppm PCB waste, the town may wish to consider collecting additional samples to confirm PCB concentrations are < 50 ppm since EPA has seen similar manufactured materials to have PCB concentrations > 50 ppm.

Number 2	Author: ktrisa	Subject: Highlight	Date: 11/20/2015 4:31:37 PM
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Number 3	Author: ktrisa	Subject: Sticky Note	Date: 11/23/2015 12:11:43 PM
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Pressure washing of truck tires that may be impacted by PCBs would not meet the decon requirements under 761.79(c). As a potential alternative to the 761.79(c) requirements, wipe sampling may be a possibility, but only for screening purposes (objective: no detectable PCBs) since the truck tires would likely be considered a porous surface.

What does EQ/NE plan to do with the wash water?

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Telephone: 203-341-1111

(6 locations in all) the Owner's environmental representative (TRC) will perform verification sampling in accordance with the approved SIP and corresponding approval conditions. Results shall be satisfactory at less than 1 PPM. Tools and equipment used for the remediation will be decontaminated in accordance with CFR 761.79 Subpart S, double wash/rinse method. Truck tires from this phase of the project will not need to be decontaminated, as they will not enter the excavation area.



## *Wipe Sample Structural Steel*

In accordance with the EPA Approval Letter, the steel within the building is assumed to contain PCB concentrations >50 PPM in surface contamination caused by previous transformer remediation and/or historic site activities. Wipe sampling will be conducted in order to prove that the structural elements can be recycled without restriction.

The steel will be wipe sampled at a frequency and method consistent with those prescribed in CFR 761.61 Subpart P. Each column is approximately 7 square meters; therefore each sampled column will produce 3 randomly selected sample locations. Those locations will be sampled using the standard wipe test as defined in 40 CFR 761.123, using 10 cm by 10 cm templates and sampling materials supplied by the previously certified Laboratory, York Analytical Laboratory in Stratford, CT (certification attached as Attachment A).

Three wipe samples are proposed for each column. Wipe samples will be composited into a single sample representing the entire surface of the column. Chemical analysis will be performed in accordance with 40 CFR 761.272. Results will be interpreted in accordance with 40 CFR 761.316 (b), and the analytical data will represent the column as a whole. Results of less than 10µg/100cm<sup>2</sup> will indicate that the steel can be recycled without restriction. Results of greater than or equal to 10µg/100cm<sup>2</sup> will cause the steel to be decontaminated in accordance with CFR 761.79, double wash/rinse method and then resampled.

Wipe sampling will first be conducted on those beams/columns in closest proximity to former PCB-containing transformers and/or areas where previous PCB remediation has occurred. If wipe sampling of these targeted beams/columns indicates that PCBs are not present above the remedial goal, no further wipe sampling of columns/beams is proposed. If wipe sampling indicates that the targeted beams/columns contain PCBs above the remedial goal, wipe sampling of the adjacent beams/columns will continue until such sampling indicates PCB concentrations are below the remedial goal. The attached Sketch A indicates the locations of the previously removed transformers which contained dielectric fluids and the columns closest to the former transformer locations to be sampled.



Steel found to contain PCB above the remedial goal will be decontaminated again in accordance with CFR 761.79 and/or will be disposed of as PCB remediation waste.

## *Remove and Characterize Overhead Crane Steel for Disposal*

In accordance with the approved SIP and EPA Approval Letter, the overhead crane steel is indicated to be disposed as PCB remediation waste >50 PPM. Wipe samples will be performed as indicated in the previous section to determine the actual level of surface contamination on the crane steel. Results of wipe sampling will be used to identify the proper handling and disposal of the crane steel. If wipe sampling indicates that PCBs are present on the steel at concentrations above the remedial goal of



## Page: 5

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Number: 1 Author: ktisa Subject: Sticky Note Date: 11/20/2015 4:39:46 PM

Decor provisions for tools/equipment are found at 761.79(c). With respect to the truck tires, does any equipment that would be used for the interior work have tires?

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Number: 2 Author: ktisa Subject: Sticky Note Date: 11/23/2015 3:52:26 PM

Please clarify the total number of beams present in the building. How many beams will be sampled initially?

Given how PCBs were spread at this facility, it is not clear that potential contamination would be limited to just that area of the building. Thus, some additional random sampling may be worthwhile.

For sampling the beams, EPA assumed that the wipes would be collected from the surfaces where dust would accumulate unless there was evidence of a direct release (e.g., staining).

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Number: 3 Author: ktisa Subject: Sticky Note Date: 11/23/2015 12:15:11 PM

It is not clear how many samples will be collected from the crane steel and how the sampling locations will be determined.



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10 µg/100 cm<sup>2</sup>, the steel may be decontaminated in accordance with 40 CFR 761 Subpart S and wipe sampled again, or may be disposed of based on the detected concentrations.

## *Remove section of concrete slab with PCB concentrations of >50 PPM*

Known areas of floor slab and soil (sample locations T4-6 and SB-7A) with concentrations of >50 ppm PCB will be removed prior to demolition in order to eliminate the potential for cross contamination. Pneumatic breaking equipment with wet methods/water misting will be utilized to remove the full thickness of the slab. Materials will be kept damp, but no flowing water will be generated. Concrete and soil will be comingled into a lined, covered roll off container. Storage will be done in accordance with 40 CFR 761.50 with the use of M<sub>1</sub> Markers on all storage containers. Upon completion of verification samples by TRC and the receipt of verification sample results, the >50 ppm soil and concrete will be transported by EQ Northeast to their Wayne Disposal facility in Detroit Michigan for disposal as PCB Remediation Waste >50 ppm.



## *Structure Demolition*

Specific details regarding the demolition of the building are included in the Demolition Work Plan. Generally, demolition of the steel structure will be carried out with a Volvo 460 excavator equipped with an 80 foot high-reach attachment and mechanical grapple and sheer. Support equipment will be needed to consolidate stockpiles and clean the slab. The building debris will be stockpiled at the perimeter of the slab to allow for loading onto trucks without the trucks having to enter the exclusion zone. The roof of the building contains asbestos, which will be handled within a regulated area utilizing water misting equipment to avoid generating dust. No free flowing liquid will be allowed to accumulate.

Upwind and downwind air monitoring for dust will be implemented during demolition and PCB remediation activities. Each air monitoring station will utilize a TSI Incorporated, Model 8530 Dustrack II. If either instrument detects a 20% increase in dust levels over background, work will stop and dust control measures will be employed.

The loading and transportation of demo material off-site will be organized so as to minimize contact with PCB contaminated materials. Trucks will enter the site at the main gate and drive around the slab on the access road to the point of loading. Once loaded, they will continue around the building back to the main gate to exit. By keeping the trucks off the slab, the spread of contamination and the need for decontamination will be eliminated. See Sketch A for the haul route around the slab.

## *Expansion Joint Removal*

Prior to milling or removal of the floor slab, asbestos containing joint sealants or other materials will be abated to the extent required to prevent comingling of ACM with concrete in accordance with Section 02 82 00 of the Project Specifications. Removal of remaining portions of asbestos-containing joint sealants may be completed as needed during authorized slab removal activities.

A rolling scaffold system will be erected and covered with a polyethylene containment, within which the expansion joint material will be removed by EPA trained asbestos and HAZWOPER workers by chipping and/or sawcutting the concrete on either side of the joint. Wet methods will be used and the areas will be cleared by the owner's environmental consultant. The resultant waste and any residual



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slurry will be profiled for disposal at Turnkey as a PCB remediation waste <50ppm with non-friable asbestos.



## Waste Characterization, Milling and Disposal of Upper Inch of Concrete Floor

### Introduction

This section of the Contractor Work Plan describes the means and methods that will be used to:

- Pre-characterize the upper 1-inch of the concrete floor slab for PCB concentrations;
- Determine the suitability of the proposed disposal facility for each sub-portion of the waste stream; and
- Remove and direct load the upper 1-inch of concrete for transport to the disposal facility.
- A Milling Plan will be submitted separately.

Previous sampling of the concrete building slab by others has indicated that low levels of PCBs (>1 ppm and < 50 ppm) are present in the top 1-inch of concrete throughout most of the building. The EPA approved Modified Self Implementing Plan dated January 2015 and amended by EPA comments and responding clarifications specifies that this upper inch of concrete will be removed from across the slab through the use of a road milling machine (also known as a "cold planer"). The plan also called for each batch of milled concrete waste to be sampled out of lined roll-off containers and analyzed to confirm that the waste contains less than 50 ppm PCB.

This Contractor Work Plan proposes an alternative approach of determining the PCB concentration of each batch of concrete waste prior to it being milled. This pre-characterization approach offers several strong advantages including reduced material handling, significantly reduced need for on-site material storage and better overall control and coordination through the use of "load and go" material transportation. This section of the work plan discusses the specifics of the pre-characterization process. Other sections of the Contractor Work Plan will describe the other elements of the work.

Prior to conducting the pre-characterization testing of the building's floor slab, the building must be made safe by completing asbestos abatement activities and removing the residual structural elements so that only the slab remains. Once the building has been demolished, the following procedures will be used to pre-characterize the upper 1-inch of the floor slab: the slab will be final cleaned for asbestos contamination prior to pre-characterization sampling and a visual clearance inspection will be done by the owner's consultant. In those slab areas where PCB contamination penetrates through the entire thickness, the concrete will be removed in its entirety. Slab areas where PCB concentrations exceed 50 PPM will also be removed in their entirety prior to pre-characterization sampling to prevent cross contamination.

### Pre-Characterization Sampling and Analysis

Once the asbestos and upper structure is removed so that the building is safe, the pre-characterization sampling and analysis process can begin. Using the method described below, the floor slab has been divided into 81 sections, with each section representing the source of a future load of milled concrete waste (see Sketch B). Each pink and white band on the figure represents the source area for a load of concrete.

Each of the 81 bands will be characterized for its PCB content through the analysis of a composite sample. The composite sample will consist of 5-subsamples collected from within the band. Because the bands are only 7 or 14 feet wide and over 100 feet long, the subsamples will be collected equidistant from each other along the center line of each band. At least 50 cc of sub-sample will be collected at each subsample location and the 5 subsamples will be thoroughly mixed to make up the

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Number: 1	Author: ktisa	Subject: Sticky Note	Date: 11/23/2015 12:53:58 PM
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Please see previous comment regarding the expansion joint sealant

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Number: 2	Author: ktisa	Subject: Sticky Note	Date: 11/23/2015 3:55:17 PM
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It is unclear what is meant by a "slurry". If the slurry is liquid in nature, it could not be disposed of in a landfill. Clarification is requested on this.

# Standard Demolition Services, Inc.

DEMOLITION CONTRACTORS

101 Middle Street  
East Windsor, NJ 07834  
201-261-1111  
www.standard-demolition.com

composite sample. The pre-characterization sampling will be conducted in accordance with the EPA Region 1 Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs) Revision 4 dated May 5, 2011 at an interval depth of 1.0 inch. A composite sample comprised of 5 discreet samples will have an acceptance level of approximately 9.0 ppm (45 ppm ÷ 5 samples) to ensure that the <50 ppm acceptance limit for disposal is met. Likewise, if any composites are made up of 4 discreet samples, the acceptance level will be 11 ppm (44 ppm ÷ 4 samples).



## *Method for determining the size of the milling areas and assessing the PCB concentrations*

The sizes of the milling areas and their PCB concentrations will be determined using the following method.

- a. Milling area size determination is as follows:  
The area of slab that comprises a single 25 ton load of concrete milling waste is 3,500 SF
  - i. 25 tons = 12.5 CY
  - ii. 12.5 CY ÷ 1.1 inch = 409 Sq Yd = 3,681 SF (round down to 3,500 SF to be more conservative)
  - iii. The milling machine has a 7 foot wide drum
  - iv. 3,500 SF ÷ 7 feet = 500 linear feet (L.F) per load
  - v. 283,500 sf Slab to Mill ÷ 3,500 SF per load = 81 loads of millings = 81 composite sample sets. Each composed of 5 discreet samples from within each of the 3,500 SF grid locations.
- b. The building slab to be milled will be divided into rectangular grids, each section will be representative of a single load of millings to be disposed as <50 PCB Remediation Waste. Sampling and analysis will be performed to determine PCB concentrations.
  - i. As previously discussed in this plan, waste characterization will be occurring "per load" in this modified approach.
  - ii. As indicated above, each sample grid will consist of 3,500 SF of concrete slab, 500 feet long by 7 feet wide, or 250 by 14, or some other multiples of 3,500 depending on the shape of the area to be milled into a single load.
  - iii. See attached drawing for grid locations.
  - iv. Each load area will have 5 samples drawn from it consistent with the Standard Operating Procedure for Sampling Concrete in the Field.
  - v. The approved Laboratory contractor will pick up samples at the job site daily.
  - vi. Tools and equipment used for sampling will be decontaminated in accordance with CFR 761.79 (C)(2). After each sample grid is completed, the drill bit will be wiped with an alconox/water solution and rinsed with clean water until all visible concrete residual has been removed.
- c. For load areas with test results <50 ppm, the resulting waste will be disposed of at Turnkey Landfill, Rochester, New Hampshire, a facility that can accept PCB remediation



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Number 1	Author ktisa	Subject: Sticky Note	Date 11/23/2015 3:56:48 PM
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Please confirm that the pie characterization wai not include those areas which have been deemed to be a ~ 50 ppm PCB remediation waste since there are several areas in the building where PCBs > 50 ppm are still present. It is indicated that these areas will be removed prior to sampling. but for clarification, these areas should be identified on Sketch B.

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Number 2	Author ktisa	Subject: Sticky Note	Date 11/23/2015 1:02:19 PM
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What is the depth in feet if listed as 1.1 inches?



# ***Standard Demolition Services, Inc.***

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TEL: 313.486.8044  
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500 N. Main Street  
Troy, MI 48063



waste < 50 ppm. For any unexpected load areas with PCB concentrations of 50 ppm or greater, the resulting waste will be disposed of as PCB remediation waste > 50 ppm at EQ's Wayne Disposal Inc. in Detroit Michigan, a disposal facility permitted to accept this waste type. Greater than 50 PPM areas will be removed prior to area wide milling to prevent cross contamination, and will be stored as previously discussed.

## ***Floor Drain System***

To the extent designated for Phase III PCB Remediation, and if funding levels allows and authorized by the Town, the remaining floor drain structures, associated piping, and residual contents will be excavated and disposed of as PCB Remediation Waste > 50 mg/kg at a TSCA facility. Acid lines and overlying concrete will be disposed of as PCB Remediation Waste < 50 mg/kg at a non-TSCA facility. After excavation of floor drains, verification soil samples will be collected by TRC on a 5-foot grid pattern from the base and walls of the excavations of the floor drains for the analysis of PCBs (and other parameters as needed to address RCRA program considerations). No compositing of associated verification samples is proposed. If significant (i.e., greater than background) soil vapors are detected using a photo-ionization detector (PID) and/or field observations (e.g., visual, olfactory) indicate the presence of VOCs, samples will be analyzed for VOCs in addition to PCBs. For investigation purposes, soil samples will be collected by TRC at each pipe joint and otherwise at maximum 25-foot intervals, along the runs of piping and acid lines, and submitted for the same analyses.

## ***Verification Sampling***

After the milling operation is complete, post removal verification samples will be taken by the owner's representative, TRC. This proposed method has been previously approved by EPA and this Contractor Work Plan accepts that methodology.

## ***Attachments:***

Attachment A- York Laboratory Certification

Sketch A- Column sampling locations and Wheel Wash / Equipment Decon location

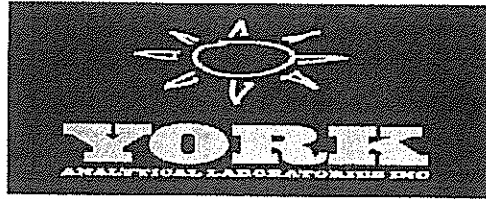
Sketch B- Pre-Characterization Grid locations

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Number: 1	Author: ktisa	Subject: Sticky Note	Date: 11/23/2015 3:57:43 PM
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If any "load areas" are found to have PCB concentrations > 50 ppm, notification to EPA will be required. EPA's Approval was based on the previous information provided in that with exception of limited areas, all > 10 ppm PCB contaminated areas had been removed. If new information comes to light that would indicate unidentified > 50 ppm PCBs are present, additional sampling may be necessary to delineate the > 50 ppm PCB contaminated area.



September 29, 2015

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)  
USEPA Region 1  
5 Post Office Square, Suite 100  
Boston, MA 02109

RE: Laboratory Certification – Century Enterprise Center, Aspetuck Road, New Milford, Connecticut

Dear Ms. Tisa:

This is to certify that York Analytical Laboratories, Inc. (York) has reviewed the requirements stated in PCB Approval Conditions (Attachment 1) for the chemical extraction and analysis of PCB samples in support of the Century Enterprise Center Site in New Milford, Connecticut.

York will conduct analysis for PCBs for solid matrices using SW-846 Method 3540C (soxhlet extraction) and for aqueous matrices using SW-846 Method 3510 (liquid-liquid extraction by separatory funnel). Instrumental analysis of PCB samples will be conducted in accordance with SW-846 Method 8082.

If you have any questions or require additional information, please feel free to contact me at (203)325-1371 or via email at [lgulizia@yorklab.com](mailto:lgulizia@yorklab.com).

Respectfully,

Lidya Gulizia  
Client Services Director  
York Analytical Laboratories, Inc.

cc: Mr. Todd Weldon, Standard Demolition Services

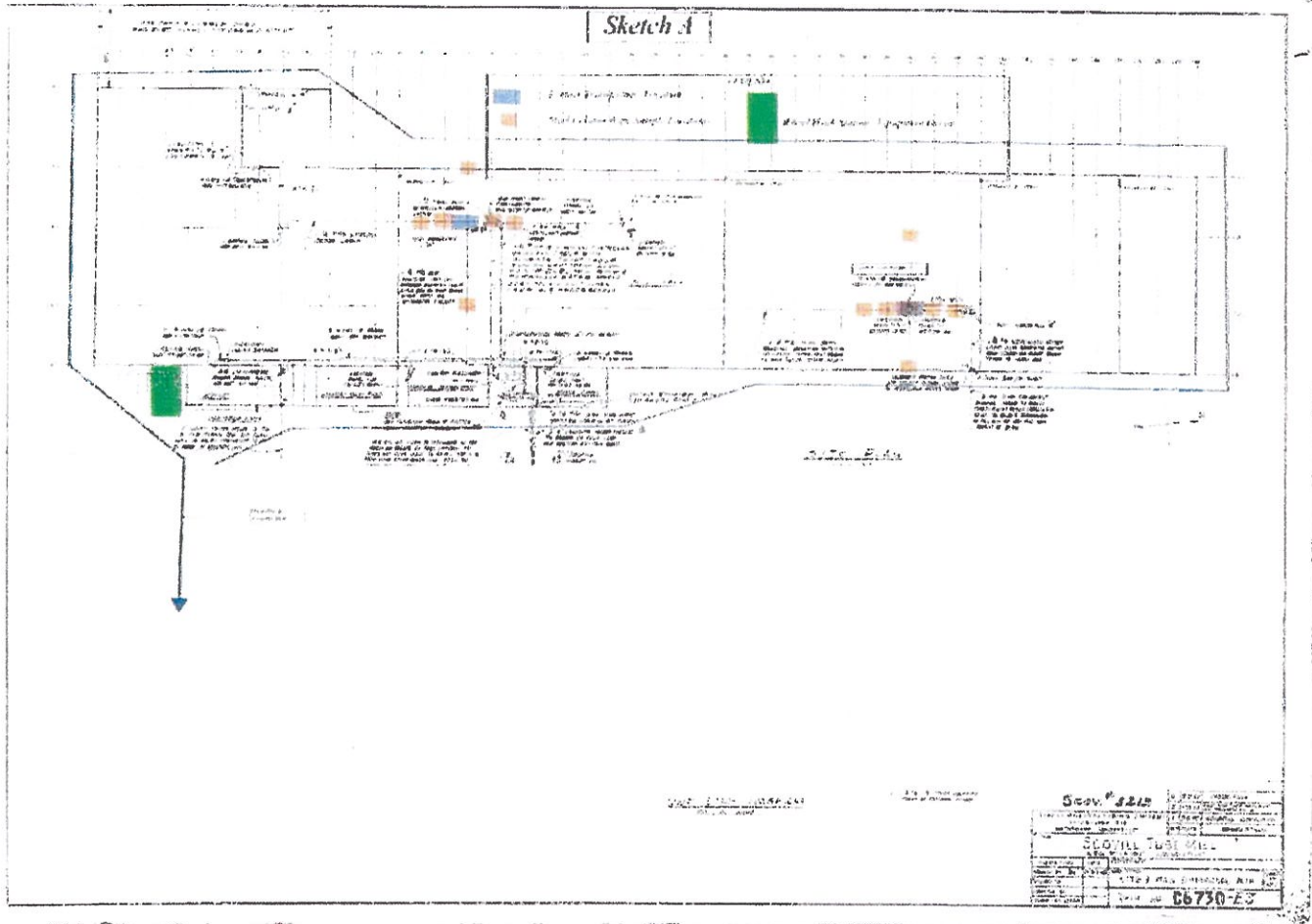
THE UNIVERSITY OF CHICAGO



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 1994-1995 48,424,197 48 48-49

1. NAME (Last, first, middle initial)		SCOTT, JESSE M	
2. DATE OF BIRTH (MM/DD/YYYY)		01/01/1947	
3. PLACE OF BIRTH (City, State, Country)		NEW YORK, NEW YORK, U.S.A.	
4. SOCIAL SECURITY NUMBER		[REDACTED]	
5. CURRENT ADDRESS (Street, City, State, Zip)		[REDACTED]	
6. OCCUPATION		[REDACTED]	
7. EDUCATION (Degree, Institution)		[REDACTED]	
8. MARITAL STATUS		[REDACTED]	
9. CONTACT INFORMATION (Phone, Email)		[REDACTED]	
10. SIGNATURE		[REDACTED]	
11. DATE OF SIGNATURE		[REDACTED]	
12. OFFICIAL USE (Stamp, Signature)		[REDACTED]	

# Sketch A





The map shows the Fort Belknap Reservation, Montana, with a grid system. The reservation is bounded by the 106th and 107th meridians and the 48th and 49th parallels. The Fort Belknap is located at the intersection of the 106th meridian and the 48th parallel. The Fort Belknap Hotel is located at the intersection of the 106th meridian and the 48th parallel. The Fort Belknap School is located at the intersection of the 106th meridian and the 48th parallel. The map includes a compass rose indicating North.

and the fact that the *in vitro* and *in vivo* results are in good agreement. The authors conclude that the *in vitro* results are a good indication of the *in vivo* results.

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